



March 18, 2025

Hon. Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
VIA ECF ONLY

Re: *Shkolir, et. al v. RX2GO, Inc., et. al.*; 1:23-cv-7256-OEM-PK (EDNY)
THIRD MOTION TO EXTEND TIME TO FILE MOTION TO AMEND COMPLAINT

Your Honor:

I represent the Plaintiffs in the above-referenced action. Pursuant to Your Honor's Minute Entry and Order of February 21, 2025, the deadline for Plaintiffs to file their Motion to Amend their Second Amended Complaint is March 21, 2025, with any opposition by Defendants to be due by April 4, 2025. Plaintiffs respectfully request that this be extended one last time, to shortly after the Settlement Conference which you have scheduled for April 30, 2025. While we are not settled yet, the parties keep making progress, and it would seem to make more sense devoting time and resources to those efforts at this time. We therefore ask that the new motion deadline be May 14 and the response May 28. It is not our intention to seek any other extension requests as to this motion. Defense counsel consents to this request. Pursuant to the Court's individual practice standards, the following is offered:

- a. The original date to file Third Amended Complaint: January 24, 2025; and Defendants' response by January 31, 2025.
- b. The reason for the request: See above.
- c. The number of previous requests for adjournment or enlargement: Two.



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- d. Whether these previous requests were granted or denied: Granted.
- e. Whether the adversary consents, and, if not, the reasons given by the adversary for refusing to consent: Opposing counsel consents to this request.

This request is not anticipated to impact or affect any other deadlines in this case.

Thank you for your consideration.

Sincerely,

Penn Dodson, Esq.

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